

EXHIBIT 2

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Attorneys for Defendant
UNITED STUDENT AID FUNDS, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SHYRIAA HENDERSON,

Plaintiff,

v.

UNITED STUDENT AID FUNDS,
INC.,

Defendant.

Case No. 3:13-cv-1845-L-BLM

**DEFENDANT UNITED
STUDENT AID FUNDS, INC.'S
SUPPLEMENTAL RESPONSE
TO PLAINTIFF SHYRIAA
HENDERSON'S
INTERROGATORY NO. 21**

PROPOUNDING PARTY: Plaintiff, SHYRIAA HENDERSON
RESPONDING PARTY: Defendant, UNITED STUDENT AID FUNDS,
INC.
SET NUMBER: TWO

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DEFENDANT UNITED STUDENT AID
FUNDS, INC.'S SUPPLEMENTAL
RESPONSE TO PLAINTI 3:13-CV-1845-L-

BLM

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendant
2 United Student Aid Funds, Inc. (“Defendant”) hereby provides its Supplemental
3 Response to Interrogatory No. 21, propounded by plaintiff Shyriaa Henderson, as
4 follows:

5 **SUPPLEMENTAL RESPONSE**

6 **INTERROGATORY NO. 21**

7 IDENTIFY any other vendors or third parties, in addition to the previously
8 disclosed collection agencies who may have handled the Plaintiff’s loans, Sallie
9 Mae, Inc. (now known as Navient Solutions, Inc.), Pioneer Credit Recovery, GC
10 Services, General Revenue Corporation, National Enterprise Systems, and NCO
11 Group, used during the RELEVANT TIME PERIOD to interact with internal phone
12 systems or external telecommunication networks, including but not limited to any
13 individual or company that provides outbound dialing services on YOUR behalf
14 (*i.e.* third parties who engaged in making collection efforts on YOUR behalf).

15 **RESPONSE TO INTERROGATORY NO. 21**

16 Navient Solutions, Inc., formerly known as Sallie Mae, Inc. was the servicer
17 of Plaintiff’s loans for which defendant was the guarantor. Defendant understands
18 that the following companies made collection calls on its behalf during the relevant
19 time period: Account Control Technology, Inc., Central Credit Services (f/k/a
20 Integrity Solutions Services, Inc.), Coast Professionals, Delta Management
21 Associates, Diversified Collection Services, Enhanced Recovery Co., Enterprise
22 Recovery Systems, Inc., EOS CCA, F.H. Cann & Associates, Inc., Financial Asset
23 Management Systems, Inc., Financial Management Systems, GC Services, General
24 Revenue Corporation, iQor – Allied Interstate LLC, National Enterprise Systems,
25 NCO Group, Oxford Management Services, Pioneer Credit Recovery, Premiere
26 Credit of North America, Transworld Systems, Inc., Valentine & Kebartas, Inc.,
27 Van Ru Credit Corporation, West Asset Management, Windham Professionals.

28
DEFENDANT UNITED STUDENT AID
FUNDS, INC.’S SUPPLEMENTAL
RESPONSE TO PLAINTI 3:13-CV-1845-L-
BLM

1 Dated: August 17, 2015

VEDDER PRICE (CA), LLP

2
3 By: 
4 Lisa M. Simonetti

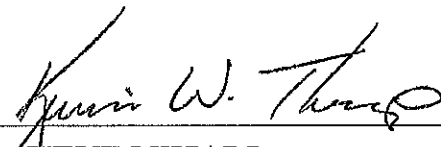
5 Attorneys for Defendant
6 UNITED STUDENT AID FUNDS,
7 INC.

8
9 **VERIFICATION**

10
11 I, Kevin Tharp, am the Manager for Delinquency & Default Oversight for
12 defendant United Student Aid Funds, Inc. and I am authorized to make this
13 verification for and on behalf of defendant United Student Aid Funds, Inc. in this
14 action. I have read the foregoing document, entitled Defendant United Student Aid
15 Funds, Inc.'s Response to Plaintiff Shyriaa Henderson's Interrogatory No. 21, and
16 hereby certify that the Response herein is true and correct to the best of my
17 knowledge, information and belief, based on information provided to defendant
18 United Student Aid Funds, Inc.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct.

21
22 Executed on this 17th day of August, 2015 at Indianapolis, Indiana

23
24 
25 KEVIN THARP

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 1925 Century Park East, Suite 1900, Los Angeles, California 90067.

On August 17, 2015, I served the foregoing document described as: **DEFENDANT UNITED STUDENT AID FUNDS, INC.'S SUPPLEMENTAL RESPONSE TO PLAINTIFF SHYRIAA HENDERSON'S INTERROGATORY NO. 21** on the parties in this action by serving:

SEE SERVICE LIST

☒ **By Envelope** - by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelopes addressed as below and delivering such envelopes:

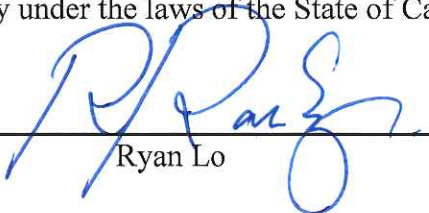
☒ **By Mail: As follows:** I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **By Federal Express:** I caused the envelope(s) to be delivered to the Federal Express office at 1925 Century Park East, Suite 1900, Los Angeles, California 90067, on August 17, 2015, for delivery on the next-business-day basis to the offices of the addressee(s).

☒ **By E-Mail Electronic Transmission:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the person(s) at the e-mail address(es) so indicated. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was incomplete or unsuccessful.

Executed on August 17, 2015, at Los Angeles, California.

STATE I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Ryan Lo

SERVICE LIST

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